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(804) 322-4776

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JUN 16 1994

U.S. Environmental Protection Agency, Region III
Attn: Mr. Robert Stroud
841 Chestnut Building
Philadelphia, Pennsylvania 19107

Re: Sampling Omissions at Site 11 During the NAS Oceana
POL Field Investigation

Dear Mr. Stroud:

During the POL CMS field investigation in February 1994, several soil samples were mistakenly not collected from the Site 11 fuel-farming area. I brought this to your attention in mid-May and discussed a proposal not to collect the samples because all other indications are that the fuel-farming area is clean. During our conversation, you requested I send for your review a written explanation of the justification for this proposal. This letter briefly explains the reasons not to collect the samples.

As stated in the POL workplan, three geoprobe soil samples (11-GS1, 11-GS2, and 11-GS3) were to be collected and analyzed for the following parameters: volatiles, TPH, PAHS, and metals. The full suite of parameters was collected for 11-GS2; however, only TPH was sampled at 11-GS1 and 11-GS3. CH2M HILL believes that the omission of the volatiles, PAHs, and metals samples from the sampling locations should not impact remediation decisions about this site for the following reasons:

1. Analyses of the Site 1 and 11 monitoring wells directly within the fuel-farming area have historically been non-detected for all constituents.
2. These contaminants were not detected in either the POL CMS in-situ groundwater samples or the geoprobe soil sample (11-GS2).
3. The TPH results from 11-GS1 and 11-GS3 were below the IDL at <2,000 and <2,100 ppb respectively, which also suggests that these two are clean.

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The fuel-farming area was used as a remediation area and as such was specifically oriented towards eliminating contamination. All data suggests that any contamination that was present in the fuel-farming area has been eliminated.

If you have any questions, please feel free to call me at
(804) 322-4776.

Sincerely,

J. F. HARRIS, P.E.
Remedial Project Manager
Installation Restoration Section
(North)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Copy to:

NAS Oceana (Mr. W. Bullard)
CH2M Hill (Messrs. D. Dronfield, S. Brown, C. Bozzini)

Blind copy to:

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